

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

No. 03-MDL-1570 (GBD) (SN)

PUBLIC REDACTED VERSION

REPLY DECLARATION OF ERIC R. NITZ

Pursuant to 28 U.S.C. § 1746, ERIC R. NITZ declares as follows:

1. I am a partner at MoloLamken LLP and represent defendant Dallah Avco Trans Arabia Co., now known as Dallah Trans Arabia Co. (“Dallah Avco”), in this action. I submit this declaration in connection with Dallah Avco’s Reply in Support of its Renewed Motion To Dismiss or in the Alternative for Summary Judgment.

2. Attached as Exhibit 97 is a true and correct copy of the full transcript from the deposition of Samuel G. Coombs, taken on June 22, 2021, including the portions taken pursuant to the FBI protective order.

3. Attached as Exhibit 98 is a true and correct copy of a document produced by Saudi Arabia in this action with Bates number KSA0000000904 and a certified translation.

4. Attached as Exhibit 99 is a true and correct copy of Salary Table 2024-SD, the U.S. government’s 2024 General Schedule of federal employee salaries for the San Diego / Chula Vista / Carlsbad, California locality, which I downloaded from the Office of Personnel Management’s website at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/SD.pdf>.

5. Attached as Exhibit 100 is a true and correct copy of the U.S. Office of Personnel Management's 2001 General Schedule Locality Rates of Pay for the San Diego, California locality, which I downloaded from a historical archive of the Office of Personnel Management's website at <https://web.archive.org/web/20090513075802/https://www.opm.gov/oca/01tables/GSannual/html/sandiego.htm>.

6. Attached as Exhibit 101 is a true and correct copy of an excerpt from the transcript of the Court's January 18, 2017 hearing in this case.

7. Attached as Exhibit 102 is a chart containing Dallah Avco's objections to the exhibits cited in ¶¶ 627-723, 874-875, and 1189-1190 of Plaintiffs' Corrected Averment of Facts and Evidence in Support of Their Claims Against the Kingdom of Saudi Arabia and Dallah Avco (Dkt. 9541-1). Dallah Avco also adopts and incorporates the Kingdom of Saudi Arabia's objections to plaintiffs' exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 4, 2023
Washington, D.C.


Eric R. Nitz